

*Memorandum*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VELERON HOLDING, B.V.,

Plaintiff,

v.

BNP PARIBAS SA, *et al.*

Defendants.

DOCUMENT  
ELECTRONICALLY FILED

DOC #:

DATE FILED: 12/11/12

12 Civ. 5966 (CM)

**STIPULATION AND PREVIOUS ORDER TO FILE UNDER SEAL**

WHEREAS, this Court ordered on September 23, 2012 that the Complaint and exhibits attached thereto in this matter be permanently sealed; and

WHEREAS, in response to Motions to Dismiss filed by Defendants BNP Paribas ("BNPP"), Credit Suisse International ("CSI"), the Royal Bank of Scotland N.V. ("RBS"), Nexgen Capital Limited (Nexgen"), Morgan Stanley, Morgan Stanley Capital Services, Inc., Morgan Stanley & Co., Incorporated, and Morgan Stanley & Co. (collectively "Morgan Stanley," and together with BNPP, CSI, RBS and Nexgen, "Defendants") on November 16, 2012, Plaintiff Veleron Holdings N.V. ("Veleron" or "Plaintiff") intends to file a First Amended Complaint (the "Amended Complaint") and seek to file the Amended Complaint under seal; and

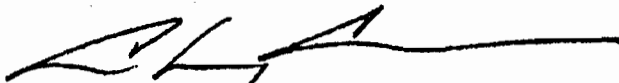
WHEREAS, Plaintiff intends to file an Amended Complaint and good cause exists for it to be filed under seal because the Amended Complaint does (and is anticipated to) quote from, discuss, and cite confidential information;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the Amended Complaint and all exhibits attached thereto shall be filed under seal subject to the approval of this stipulation by the Court.

IT IS FURTHER STIPULATED AND AGREED that all parties consent to service of the Amended Complaint filed under seal in the above-captioned matter by email.

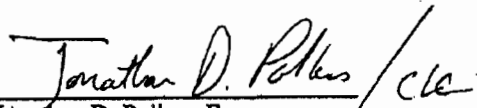
Dated: New York, New York  
December 7, 2012

By:



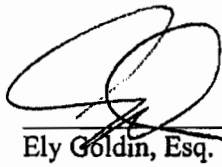
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*Counsel for Defendant BNP Paribas, Credit Suisse International, the Royal Bank of Scotland N.V., and Nexgen Capital Limited*



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*Counsel for Defendants Morgan Stanley, Morgan Stanley Capital Services, Inc., Morgan Stanley & Co., Incorporated, and Morgan Stanley & Co.*



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*Counsel for Plaintiff Veleron Holdings, B.V.*

SO ORDERED:



HON. COLLEEN McMAHON  
United States District Judge

12/10/2012 